

submissions

From: Deb Gully, DietNet [REDACTED]
Sent: Monday, 9 February 2015 4:31 PM
To: submissions
Subject: Proposal P1016 - Hydrocyanic Acid in Apricot Kernels & other Foods

The problem as defined by the proposal document

“The problem that this Proposal seeks to address is the potential health outcomes of hydrocyanic acid (HCN) poisoning caused by consumption of raw apricot kernels, which, if the levels are high enough, can include death. General symptoms of sub-lethal doses have been reported as abdominal pain, headache, dizziness, short-term memory loss, confusion, flushing, palpitations and general illness. The risk assessment undertaken by FSANZ indicated that consumption of raw apricot kernels, both unhulled (with skin) and hulled (without skin), poses an unacceptable acute risk to public health and safety for consumers due to HCN poisoning.”

Your document contains a lot of scientific evidence about the theoretical dangers of cyanide poisoning from apricot kernels. But the theoretical danger is supported by very little actual, real life evidence, so must be considered a hypothesis only.

A summary of the cases as listed in your document shows:

		No of reports	Time period
New Zealand	Adults	13	10 years (2003-2013)
	Children	7	10 years
Victoria	Adults	27	9 years (2005-2014)
	Children	6	9 years
NSW	Adults	64	10 years (2004-2014)
	Children	13	10 years
Western Australia	Adults	20	11 years (2002-2013)
	Children	6	11 years
Queensland	Adults	13	10 years (2003-2013)
	Children	1	10 years

So we are looking at 137 adult and 32 child enquiries, over approximately 10 years, giving a rough average of 14 adult and 3 child enquiries per year for the whole of Australasia. Note that these are the total calls or reports to poison centres. Some of these are general enquiries, and in many instances no symptoms were reported.

You have only quoted two specific instances where medical intervention was required. Although these people were hospitalised, there is no report of death or long term problems.

- In May 2011 a consumer in Queensland was hospitalised after consuming raw apricot kernels with high levels of HCN.
- In July 2014, a consumer was hospitalised after consuming unhulled raw apricot kernels with high levels of HCN.

You state: “In addition, there have been a number of confirmed reports of poisoning incidents in other countries following consumption of raw apricot kernels.” But the only supporting evidence I could find in your document were these reports:

- The most recent Canadian poisoning incident occurred in May 2009, when a woman was hospitalised following the consumption of approximately 40 apricot kernels in a short period of time.
- FSANZ found two publications describing lethal consequences from consumption of apricot Kernels, but these appear to be the only confirmed deaths in the last 57 years.
 - Sayre and Kaymakcalavu (1964) report that between 1957 and 1962, two children died of cyanide poisoning in a hospital in Central Turkey after eating apricot kernels. No information was provided on how many kernels were consumed .
 - Lasch and Shawa (1981) report two more deaths of children in Gaza. One had been and another had consumed a sweet prepared from apricot kernels. Once again, there was no information on how much was consumed .

Compare these comparatively small numbers with the numbers of deaths and illnesses from other causes such as food poisoning from widely purchased foods. Or compare it with the vast number of deaths from properly prescribed pharmaceutical drugs.

We are at risk of so many more things just being alive on this planet. We cannot protect people from everything. It is clear from the numbers above that we are talking about an extremely minor risk that does not need lots of time and money thrown at it. It is nowhere near the “unacceptable acute risk to public health and safety for consumers due to HCN poisoning” that you claim.

Your five options for addressing the problem:

- Option 1: Maintain the status quo
- Option 2: Mandatory labelling of both unhulled (skin on) and hulled (skin off) raw apricot kernels
- Option 3: Set a maximum level for unhulled (skin on) and hulled (skin off) raw apricot Kernels

- Option 4: Prohibition on the sale of unhulled (skin on) raw apricot kernels with exemptions for raw apricot kernel-derived foods that are safe for consumption. In parallel, require manufacturers to provide advice for consumers on the maximum amount of hulled (skin off) apricot kernels that could safely be consumed on their labels.
 - Option 5: Prohibition on the sale of unhulled (skin on) and hulled (skin off) raw apricot kernels with exemptions for raw apricot kernel-derived foods that are safe for consumption.
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I support Option 1 – the evidence you have provided shows no need for any further time or money to be spent on this issue. Option 2 would be my second preference, but I see no need to penalize manufacturers, retailers or consumers in that way. Options 3, 4 and 5 are overkill for the level of risk.

I do not personally use apricot kernels, but I have a few clients and customers who have chosen to use them for health reasons. This has been at their own request, and they have researched the pros and cons themselves. Nature Foods retails a small amount annually to such clients, as we believe that people have the right to make their own health decisions, and should be able to source whatever natural substances they require. As we are not an importer or a producer, I have not addressed the issues in the appendices.

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